



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029



SDMS DocID 2095147

February 7, 2006

Ms. Chris Ann Gahagan
Enlibra LLC
5603 Fiddlers Ridge Lane
Midlothian, VA 23112

RE: BALLY GROUND WATER CONTAMINATION SUPERFUND SITE
FACILITY VAPOR INTRUSION EVALUATION SUMMARY

Ms. Gahagan:

The United States Environmental Protection Agency (EPA) is in receipt of the document titled, "Facility Vapor Intrusion Evaluation Summary", dated December 2006. The document was prepared by Arcadis G&M, Inc. (Arcadis).

EPA has the following comments regarding this document:

1. Page 1, Section 1.1, 1st paragraph states, "The Supplemental facility investigation was aimed at further evaluation of the former BES facility to identify any possible human health risks associated with potential vapor intrusion of Site-related Constituents of Potential Concern (COPCs) present in ground water beneath the buildings." The sentence states that ground water is expected to be the source of volatile organic compound (VOC) vapors identified in the subslab beneath the former BES facility and indoor air. Is it possible that contaminated soil present in source areas at the facility may also be responsible for the creation of VOC vapors at the Site?
2. Page 5, Section 2.2.4. If source areas have not been identified in the northwest warehouse building, to what are subslab VOC vapors attributable?
3. Page 7, Section 3.2. Please include the results of the Site-specific attenuation factor study using radon as a tracer gas. Also, EPA Region III understands that the use of radon as a tracer gas for VOC vapors, and the associated establishment of Site-specific attenuation factors was being evaluated nationally by Arcadis in cooperation with other regions of EPA. What was the outcome of that evaluation?
4. Page 13, Section 4.3.2.1, and Page 14, Section 4.3.2.2, and Page 20, Section 5.3. Arcadis concludes that elevated trichloroethylene (TCE) concentrations present in indoor air in the Impress Industries tenant space are likely attributable to an adjacent on-Site tenant, Luciano and Sons, a tub/sink manufacturer who began operations at the facility during the summer 2006. Although documentation has not been received by EPA to present, EPA understands that Arcadis

has evaluated the products used by Luciano and Sons, and has not identified a TCE-containing product. In addition, to address this concern, the EPA Environmental Response Team (ERT) from Edison, NJ was requested by EPA Region III to visit the Site with the Trace Atmospheric Gas Analyzer (TAGA) bus. The results of their evaluation will be provided to you upon receipt. Based on EPA Region III's observations of the TAGA evaluation, the following conclusions were reached: 1) TCE containing products were not identified within the Luciano and Sons tenant space, 2) TCE concentrations present in indoor air in Impress Industries (the warehousing tenant space adjacent to Luciano and Sons) were higher than inside the Luciano and Sons tenant space. Based on these observations, Arcadis's conclusion that the Luciano and Sons tenant space is the source of the TCE vapors identified in indoor air at the Impress Industries tenant space does not seem probable.

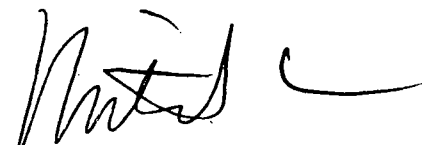
Risk assessment calculations were not included in the Arcadis report for the TCE concentrations identified in indoor air at the Impress Industries or Luciano and Sons tenant spaces. However, EPA has performed a risk evaluation using the information provided in the Arcadis report for each of these tenant spaces. The results of EPA's risk evaluation indicate that for the Impress Industries tenant space, carcinogenic risk and non-carcinogenic risks are of concern, and for the Luciano and Sons tenant space, carcinogenic risks are of potential concern.

Based on this information, EPA would like to meet with you as soon as possible to discuss what next steps are necessary to address this concern.

5. Page 14, 2nd paragraph. Cis-1,1dichloroethene should be cis-1,2-dichloroethene.
6. Table 2. On Table 2, the 1,1-dichloroethane PADEP screening number should be 50, not 510.

Please contact me if you have any questions regarding this project at (215) 814-3286.

Sincerely,



Mitch Cron, RPM
Western PA/MD Remedial Branch

Cc Asuquo Effiong, PADEP
Jennifer Hubbard, EPA
Kathy Davies, EPA

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